

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-20 are pending in the application, with claim 1 being the independent claim.

Based on the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 103

The Examiner has rejected claim 1 as being unpatentable over U.S. Patent 6,354,417 ("Leder") in view of U.S. Patent 3,657,773 ("Whitehurst") and U.K. Patent 898,078 ("Riethmann"). The Examiner first argues that Leder discloses a conveying device that strengthens a fiber lap as the fiber lap is compressed and condensed. Leder, however, does not disclose the processing of a fiber lap. Rather, Leder discloses processing of a sliver. Nowhere does Leder disclose the conveying or processing of a fiber lap as described in claim 1 of the present invention. The Examiner goes on to argue that the Leder discloses rollers that subject the fiber lap to a pressure as the fiber lap passes through a gap between the rollers, thereby strengthening the fiber web. While Leder discloses rollers through which the fiber passes, Leder does not disclose strengthening the fiber lap, as specified in claim 1 of the present invention. Leder describes the benefits of his process, and says only that his process results in "a sliver having a rectangular cross section" and "a more uniform fiber distribution

and a significantly increased output speed” (Leder, col. 2, lines 12-14). Leder goes on to say that the material “is packed in an even more pronounced manner into the rectangular cross section shape of the web” (Leder, col. 4, lines 5-8). Therefore, while Leder discloses the application of pressure to a sliver for purposes of shaping the sliver, Leder does not disclose the step of strengthening a fiber lap, as specified in claim 1 of the present invention.

Nor does Whitehurst disclose the step of strengthening a fiber lap. Whitehurst teaches the use of fluted calendar rolls, but is silent with respect to the advantages of such a roller, as pointed out by the examiner. While the Examiner offers his belief that the use of such rollers would result in a stronger fiber lap, Whitehurst nonetheless fails to disclose any strengthening of the fiber lap by the processing described therein.

The Examiner further argues that Riethmann teaches a non-woven fabric having areas that are highly compressed and are non-continuous in an axial direction. This reference, however, teaches no structure that is either cylindrical or circular. Therefore Riethmann teaches no structure or apparatus having "an axial direction"-- Reithmann discloses no "axis."

The Examiner further argues that it is obvious that the non-woven fabric described by Riethmann has been processed with rollers having non-continuous protrusions or profiled elements along an axial surface for making the localized high compression areas. This inference is not warranted. It is by no means obvious that the fabric described by Riethmann has been processed using rollers. One can imagine any of a number of mechanisms by which such fabric could be produced. A fabric could be stamped, for example, using an apparatus having a planar surface that

features non-continuous protrusions. Alternatively, a cyclic chain or belt apparatus having such protrusions could be run along the fabric. This too could result in the fabric having periodic localized areas of high compression. Therefore, Riethmann at most teaches a non-woven fabric having areas that are highly compressed and are non-continuous. Riethmann fails to disclose or suggest a particular mechanism for the production of such fabric, and certainly fails to disclose the use of such a mechanism in the processing of a fiber lap.

In addition, while the Riethmann reference concerns a fabric or wadding, the Whitehurst reference deals with the processing of fibers. The Leder reference also discusses the processing of fibers. A *prima facie* case of obviousness requires that there be some motivation or suggestion to combine such references. Such motivation or suggestion is lacking here. Given that Leder and Whitehurst teach apparatuses that process fiber, a person of skill in the art who is interested in strengthening fiber laps would not be inclined to combine the Riethmann reference with either Whitehurst or Leder. The Riethmann patent discloses a textile that is fully processed and can be used in a variety of applications, e.g., napkins and towels. Because the Whitehurst and Leder references deal with the processing of relatively unfinished fiber, the combination of these two references with the Riethmann reference is inappropriate.

For at least these reasons, the references cited by the Examiner failed to render claim 1 of the present invention obvious. In addition, because claims 2-20 depend from claim 1, the features of claim 1 are necessarily included in those claims. Given that claim 1 is not rendered obvious by any reasonable combination of the three references discussed above, none of claims 2-20 are rendered

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obvious by any of these references, either alone or in combination.

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Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,

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